

Salene R.M. Kraemer, Esquire
NY ID No. 5228580
Aurelius Robleto, Esquire
MAZURKRAEMER BUSINESS LAW
331 Jonquil Place,
Pittsburgh, PA 15228
Phone: (412) 427-7075
salene@mazurkraemer.com

**Counsel to Vir Ventures, Inc. and
AMI Ventures, Inc.**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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| In re: SEARS HOLDING CORPORATION, et al., Debtors. | Bankruptcy No. 18- 23538 (RDD) |
| VIR VENTURES, INC. AND AMI VENTURES, INC., Plaintiffs, v. SEARS HOLDING CORPORATION, et al. Defendant. | Adv. Proc. No. Related to Documents: |

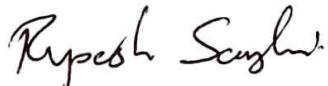
**VERIFIED AFFIDAVIT OF RUPESH SANGHAVI IN SUPPORT OF COMPLAINT
PURSUANT TO FED. R. BANKR. P. 7001(1) AND (7) FOR THE RECOVERY OF
MONEY FROM THE DEBTORS, OR IN THE ALTERNATIVE THE IMPOSITION OF
A CONSTRUCTION TRUST REGARDING SAME**

VERIFIED AFFIDAVIT OF RUPESH SANGHAVI
IN SUPPORT OF COMPLAINT PURSUANT
TO FED. R. BANKR. P. 7001(1) AND (7) FOR THE RECOVERY OF MONEY FROM
THE DEBTORS OR, IN THE ALTERNATIVE, THE IMPOSITION OF A
CONSTRUCTION TRUST REGARDING SAME

1. I, Rupesh Sanghavi, am the President of the above-captioned plaintiffs ("Plaintiffs") VIR VENTURES, INC. AND AMI VENTURES, INC..

2. I hereby submit this verified affidavit in support of that certain COMPLAINT PURSUANT TO FED. R. BANKR. P. 7001(1) AND (7) FOR THE RECOVERY OF MONEY FROM THE DEBTORS OR, IN THE ALTERNATIVE, THE IMPOSITION OF A CONSTRUCTION TRUST REGARDING SAME ("Complaint") which was filed to initiate the above-captioned adversary proceeding.

3. I can attest the facts set forth therein are true and correct to the best of my knowledge.



Rupesh Sanghavi

Taken, subscribed, and sworn or affirmed before me this 8th day of November 2019.

My Commission expires on Dec. 9, 2019



Sara Estrada
Notary Public
Print: Sara Estrada

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to in the Complaint.